

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:

CASE: A24-62216-BEM

JAIME CLARESE THOMAS

CHAPTER 13

Debtor.

JUDGE BARBARA ELLIS-MONRO

TRUSTEE'S MOTION TO DISMISS CASE
FOR FAILURE TO MAKE PLAN PAYMENTS

COMES NOW K. EDWARD SAFIR, Standing Chapter 13 Trustee herein, and files this his Motion to Dismiss Case for Failure to Make Plan Payments, respectfully showing the Court the following.

1.

The Debtor filed for relief under Chapter 13 of Title 11 on November 15, 2024. The plan was confirmed by the Court on April 2, 2025. The plan provides for general unsecured creditors to receive a pro rata portion of funds remaining after disbursement have been made to all other creditors provided for in the confirmed plan.

2.

The Debtor has failed to comply with the terms of the confirmed plan. As of September 05, 2025, the Debtor should have paid \$9,430.00. The Debtor has paid a total of \$6,108.00, causing a delinquency of \$3,322.00.

WHEREFORE, the Chapter 13 Trustee respectfully requests this case be dismissed, or that the Court grant such other relief as may be proper.

Dated: September 11, 2025

Respectfully submitted,

/s/
Deborah A. Reece, Esq.
for the Chapter 13 Trustee
GA Bar No. 283016
285 Peachtree Center Ave, Suite 1600
Atlanta, GA 30303-1229
(404) 525-1110
deborahr@atlch13tt.com

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JUDGE BARBARA ELLIS-MONRO

NOTICE OF HEARING ON TRUSTEE'S MOTION TO DISMISS
FOR FAILURE TO MAKE PLAN PAYMENTS

PLEASE TAKE NOTICE that the Chapter 13 Trustee has filed a Motion to Dismiss Case for Failure to Make Plan Payments with the Court seeking an order of dismissal.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion to Dismiss Case at 9:45 AM on October 15, 2025 in Courtroom 1402, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA, 30303, which must be attended in person, unless the Court orders otherwise.

Your rights may be affected by the Court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in these pleadings or if you want the Court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleadings with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk before the hearing. The address of the Clerk's Office is: Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta Georgia 30303. You must

also mail a copy of your response to the undersigned at the address stated below.

Dated: September 11, 2025

Respectfully submitted,

/s/ _____
Deborah A. Reece, Esq.
for the Chapter 13 Trustee
GA Bar No. 283016
285 Peachtree Center Ave, Suite 1600
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A24-62216-BEM

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing Motion to Dismiss Case for Failure to Make Plan Payments using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

THE SEMRAD LAW FIRM, L.L.C.

I further certify that on this day I caused a copy of this document to be served via first-class United States mail, postage prepaid, on the following parties at the address shown for each:

JAIME CLARESE THOMAS
2521 Cornerstone Blvd.
Hampton, GA 30228

Dated: September 11, 2025

Respectfully submitted,

/s/ _____
Deborah A. Reece, Esq.
for the Chapter 13 Trustee
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